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September 22, 2023

VIA ECF

MEMO ENDORSED

Hon. Katherine Polk Failla
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2103
New York, New York 10007

Re: *Greene v. Warner Music Group Corp. et al*, 1:23-cv-01555 (KPF)

Dear Judge Failla:

We represent defendants Warner Music Group Corp., Megan Pete and Anthony White in the above-referenced action (together, “Defendants”). We write pursuant to Rule 2(D) of the Court’s Individual Rules in Civil Cases to request the adjournment and rescheduling of the pre-motion conference in anticipation of Defendants’ motion to dismiss, which conference is currently scheduled for October 3, 2023 at 11:00 a.m. (ECF 53.)

Defendants’ counsel is unavailable on October 3 due to an in person appearance previously scheduled in another District Court case, pending in California. We have communicated with *pro se* plaintiff James A. Greene and counsel for defendant 1501 Certified Entertainment to determine dates on which all parties are available for the pre-motion conference. The parties respectfully request that the pre-motion conference be rescheduled to either October 10 or October 11, a date on which plaintiff and all served defendants are available. If the Court is unavailable on those dates, Defendants’ counsel can confer with the other parties to propose additional dates to the Court.

This is the first request for an adjournment of the pre-motion conference and all parties consent to this request.

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We thank the Court for its consideration and remain available.

Respectfully submitted,



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Attorneys for Defendants

cc: James A. Greene (via ECF system)
Kenneth David Freundlich (via ECF system)
Jonah A. Grossabrdt (via ECF system)

Application GRANTED. The pre-motion conference scheduled for October 3, 2023 is hereby ADJOURNED to **October 10, 2023**, at **10:00 a.m.** The dial-in information for the conference remains the same, and is as follows: On October 10, 2023, at 10:00 a.m., the parties shall call (888) 363-4749 and enter access code 5123533.

The Clerk of Court is directed to terminate the pending motion at docket number 54.

Dated: September 25, 2023
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE